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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

KAREN M. BAUER, Individually and	)	
on Behalf of All Others Similarly Situated,	)	Civil Action No. 09-01120 (JLL)
	)	
Plaintiff,	)	CONSOLIDATED ACTION
v.	)	
	)	
PRUDENTIAL FINANCIAL, INC., et al.,	)	
	)	
Defendants.	)	
	)	

**STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING  
MOTION TO DISMISS BRIEFING SCHEDULE**

The parties to this action, by and through their counsel, hereby agree as follows:

1. On April 9, 2009, the Court entered an order approving the parties' Stipulation and Order Extending Time to Respond to the Complaint. The Stipulation contemplated that the

amended complaint and motion to dismiss briefing deadlines would be triggered by the subsequent entry of an order by the Court appointing a lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995. Specifically, the stipulated schedule provided Plaintiffs sixty (60) days from the date of the entry of the Court's order appointing a lead plaintiff to file an amended complaint; provided Defendants sixty (60) days from the filing of an amended complaint to respond or file motions to dismiss; provided Plaintiffs sixty (60) days to file opposition to Defendants' motions to dismiss; and provided Defendants forty-five (45) days to file replies to Plaintiffs' opposition to their motions to dismiss.

2. On May 22, 2009, the Court entered an order appointing Paul J. Perry, on Behalf of the Paul J. Perry Revocable Trust, as lead plaintiff and approving Izard Nobel LLP as lead counsel and Lite DePalma Greenberg & Rivas, LLC as liaison counsel in this consolidated action. Based on the date of the Court's order appointing lead plaintiff, the stipulated schedule currently provides for the following deadlines:

- (a) July 21, 2009 – Amended Complaint
- (b) September 21, 2009 – Defendants' motions to dismiss
- (c) November 20, 2009 – Plaintiffs' opposition to Defendants' motions to dismiss
- (d) January 4, 2010 – Defendants' replies to Plaintiffs' opposition

3. In light of the upcoming holiday schedule falling immediately prior to Defendants' reply due date, Defendants requested of Plaintiffs and the parties have agreed to request a two (2) week extension of the parties' remaining deadlines, as follows:

- (a) December 4, 2009 – Plaintiffs will serve their opposition to Defendants' motions to dismiss.
- (b) January 19, 2010 – Defendants will serve their replies to Plaintiffs' opposition, and all briefs will be filed with the Court pursuant to prior Appendix N procedure and the Court's September 29, 2009 orders.

4. The parties to this stipulation respectfully request that the Court approve the time table set forth in paragraph 3 above. The parties represent that, aside from the initial schedule set in the Stipulation and Order entered by the Court on April 9, 2009, this is the first extension of the briefing schedule requested or granted.

Dated: November 6, 2009

Lead Plaintiff  
By his attorneys,

/s/ Joseph J. DePalma

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Defendants  
By their attorneys,

/s/ Liza M. Walsh

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IT IS SO ORDERED:

***s/Claire C. Cecchi***

Hon. Claire C. Cecchi  
United States Magistrate Judge

November 9, 2009